

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR ADMISSIONS,
INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH CAROLINA
et al.,**

Defendants.

PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 34 and the Local Rules of the Middle District of North Carolina, Plaintiff Students for Fair Admissions, Inc. ("SFFA") requests that Defendants ("UNC") respond in writing and produce the documents described below within 30 days of service for inspection and copying at the offices of Consovoy McCarthy PLLC, 3033 Wilson Boulevard, Suite 700, Arlington, VA 22201, or at such other location to which the parties mutually agree.

INSTRUCTIONS

1. In responding to these document requests, You shall produce separately all documents in Your possession, custody or control, including documents in the possession, custody or control of Your agents and representatives.

10. The terms “the present” or “present time” mean the date on which Your answers to these interrogatories are filed.

11. “Printed Database” is defined to include, but is not limited to, any hard-copy collection of data containing information on the race, geographic residence, qualifications, financial aid awards, and academic performance, of individuals who have or are seeking admission to UNC, including applicants, admitted students, and enrolled students, except to the extent that such hard-copy collections merely replicate information found in Electronic Databases.

12. The term “race” means race, ethnicity, or national origin.

13. “Relate” means consisting of, referring to, reflecting, evidencing, or being in any way legally, logically, or factually connecting with the matter referred to or having a tendency to prove or disprove the matter referred to.

14. “Representative” means any and all agents, servants, and employees.

15. “Underrepresented Minority” and “URM” are defined to be synonymous in meaning and equal in scope to how UNC has used or does presently use that term in any printed or electronic documents.

16. “You” and “Your” mean UNC.

DOCUMENT REQUESTS

41. All documents and communications from Your admissions office or financial aid office during the Relevant Period that form the basis of any portion of a report by the Office of Diversity and Multi-Cultural Affairs assessing Your progress toward its diversity goals. This request includes, but is not limited to, any final reports by the Office of Diversity and Multicultural Affairs similar to the report starting at UNC0124154, all

drafts of those final reports, all data and analysis thereof, any analysis of “critical mass,” and communications about the reports.

42. All documents and communications concerning student climate surveys conducted by You. *See, e.g.*, UNC0133391, UNC0190713.

43. All documents and communications concerning any survey of admitted students about why those students chose to or chose not to enroll at UNC. *See, e.g.*, Deposition of Jennifer Kretchmar at 16:23-17:3.

44. All documents and communications concerning any evaluations of the Carolina Covenant program. This request includes any analysis of student performance, course of study, and graduation rates whether or not they are related to Carolina Covenant.

45. All communications between You and Harvard University or their representatives concerning this lawsuit or the lawsuit SFFA filed against Harvard University on November 17, 2015. *See Students for Fair Admissions, Inc. v. President and Fellows of Harvard College (Harvard Corporation)*, 1:14-cv-14176 (D. Mass.). This request includes any communications between the attorneys representing UNC and Harvard University.

46. Documents sufficient to show any formula or measurement that UNC has used to predict the probability of admission for particular applicants, including, but not limited to, the model discussed in UNC0090652.

47. All prior and subsequent drafts or versions of the report “Exploring Race-Neutral Alternatives in Undergraduate Admissions” produced at UNC0097418.

48. All documents and communications regarding the Committee on Race-Neutral Strategies, referenced in UNC0079680, including, but not limited to, all documents concerning the committee's work, schedules, minutes, reports, or summaries of all committee and sub-committee meetings, the committee's final and draft reports, any communications regarding the decision to start the committee, and any communications between the committee members concerning the committee's work.

49. All drafts and the final version of the study by Abigail Panter and Charles Daye quantifying the educational benefits of diversity.

50. Final versions of any papers, studies, or formulas that You drafted or commissioned concerning "grit" (*e.g.*, UNC0108171), whether a two-reader system is necessary (*e.g.*, UNC0101747), the factors that lead to two readers disagreeing on the same application (*e.g.*, UNC0080095), how Advanced Placement courses or International Baccalaureate courses predict grade point averages at UNC (*e.g.*, UNC0083052), and the effect of legacy status on a student's chances of admission (*e.g.*, UNC0096777). If You already produced final versions of these papers or studies, please provide the Bates number for each final version.

51. All documents posted to the "Sakai" site for the Race Neutral Alternatives Working Group and the Committee on Race-Neutral Strategies or otherwise considered by those groups (*e.g.*, UNC0096592).

52. All drafts and final versions of the reading documents You use to train readers, such as those documents attached to the email located at UNC0099453.

53. All applicant, admission, and enrollment reports of the kind referenced by Jennifer Kretchmar at 148:18-149:7 of her deposition.